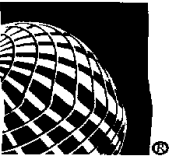


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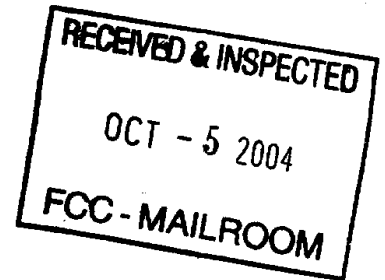


Continental Airlines, Inc.
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September 8, 2004

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Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, DC 20554

In regard to:

Amendment of Part 22 of the Commission's Rules to Benefit the Consumers of
Air-Ground Telecommunications Services, WT Docket No. 03-103

Continental Airlines, Inc. would like to offer the following comments regarding the
Federal Communications Commission's reexamination of the rules governing the
provision of air-ground telecommunications services on commercial aircraft.

Continental Airlines has utilized air-ground voice & data services in the 800 MHz band
for many years, and continues to do so today. Although the demand for voice services
has declined over the past few years, the demand for data services continues to
increase.

We estimate that the airline customer's desire for in-flight connectivity services such as
internet access, email and text messaging will only continue to strengthen moving
forward. Additionally, as the proliferation of ground-based broadband services such as
DSL, cable modems and public wi-fi hotspots continues, there is a direct correlation
with the increase in consumer data rate expectations for the onboard environment.

Continental Airlines recommends the Commission:

- 1) Retain the 4 MHz spectrum in the 800 MHz band for commercial air-ground
services.
- 2) Consider the competitive landscape in the 800 MHz band in the broad scope of
in-flight passenger data connectivity and not the more narrowly defined aspect
of a stand-alone service.

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- 3) Not divide the 4 MHz spectrum into slices and allocate those units to separate service providers, so that no service provider would have the necessary bandwidth to meet the broadband expectations of the consumer.
- 4) Allow service providers the flexibility to change their services and offerings within the spectrum (i.e. voice services versus data services), based on customer demand as the demand for these various services may vary over time. Dictating the type of services within the spectrum would only limit the service providers' abilities to adjust their offerings to best meet the consumers' needs.

Continental Airlines appreciates the opportunity to comment on this issue.

Sincerely,

A handwritten signature in cursive script that reads "James E. Compton".

James Compton
Executive Vice President – Marketing
Continental Airlines, Inc.

A handwritten signature in cursive script that reads "Mark Moran".

Mark Moran
Executive Vice President - Operations
Continental Airlines, Inc.